

GUIDE TO THE

# **TANK BARGE**

## **ALTERNATE INSPECTION PROTOCOL**

### **(TAIP)**



**for Unmanned**  
**U. S. Flag**  
**Tank Barges**

An Eighth Coast Guard District  
Pilot Program

Developed jointly by the Maritime Industry and  
the United States Coast Guard

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## **I. INTRODUCTION**

This document is a guide to the Eighth Coast Guard District's Tank Barge Alternate Inspection Protocol (TAIP) pilot program for unmanned U.S. flag tank barges. It contains detailed guidance to aid both Coast Guard personnel and interested tank barge owners and operators in developing and implementing a TAIP program.

This is an optional program for companies that own and operate unmanned U. S. flag tank barges. Companies that enroll their barges in this program can reduce operational delays by having designated individuals within their company perform the annual ("topside") inspections. The company will be permitted to conduct these inspections on all barges regardless of route, and the Coast Guard will only require a small percentage of the company's barge fleet to be made available each year for random oversight inspections by a Coast Guard Marine Inspector. For inland tank barges, the company will also be allowed to make temporary repairs for minor damage without having to obtain Coast Guard approval.

An Officer in Charge, Marine Inspection (OCMI) may allow deviations from the policies and procedures contained in this guide, especially to reward top-performing companies that have a proven track record with the TAIP or to take probationary action for marginally compliant companies. However, it is recommended that the contents of this document be strictly adhered to for barge companies first entering into the TAIP.

Companies already operating under a prototype Streamlined Inspection Program (SIP), or under an existing quality management system and/or preventive maintenance system (PMS), may have much of the fundamental material necessary for a TAIP program. Companies that have these systems in place may cross-reference to them, or include appropriate components from them directly in their TAIP program.

The TAIP is not suitable for every company, and unless it is clear that a company is proactive, responsible, and well managed then it will not be allowed to enroll and participate in the program. This program is intended for companies, regardless of size, with an absolute commitment to safety and which employ capable and dedicated maintenance and operations personnel. The initial time and effort necessary to establish a TAIP program may be considerable, and the program must receive the full backing of senior company management to ensure its success.

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## **A. Background**

In 1992, as part of its Maritime Regulatory Reform Initiative, the Coast Guard considered a number of alternatives for the inspection of U.S. flag vessels. Two of these alternatives are the Alternate Compliance Program (ACP) and the Streamlined Inspection Program (SIP). The SIP was originally developed as a prototype program in several districts. Within the confines of the Eighth Coast Guard District (D8) it was developed primarily for offshore supply vessels (OSVs). The success of the SIP is predicated upon the crewmembers of participating vessels being actively engaged in routine vessel maintenance and training, thereby keeping the vessels in a continuous state of regulatory compliance. While all parties realized that unmanned barges do not routinely have maintenance personnel aboard, they were allowed to enroll in the SIP.

In the Coast Guard Authorization Act of 1996, the Coast Guard was given latitude to accept alternatives to standard vessel inspection. While the SIP was still in the test phase, and at the request of the barge industry, various D8 units modified the SIP to satisfy the needs of the unmanned tank barge industry. In September 1998, the Coast Guard published the final rule for a national SIP program (46 CFR Part 8, Subpart E). The national SIP did not recognize the unmanned aspect of their inspected tank barges, and it still required an annual inspection, though cursory, by the Coast Guard which impacts the operational schedule of the barges and therefore does not provide any significant benefits to the industry.

In May 1999, D8 chartered a Quality Action Team (QAT) in response to the barge industry's request to have the Coast Guard reevaluate its regulatory compliance program, keeping in mind the unique nature of the barge industry. The QAT explored alternatives that would meet the special needs of the barge industry while ensuring the same levels of safety and statutory compliance. The QAT selected the prototype SIP developed by MSO Houston and Kirby Inland Marine as the model for the TAIP program, and this guide is the result of the QAT's efforts.

On February 9, 2000 the Coast Guard amended its vessel inspection regulations and introduced a 5-year Certificate of Inspection (COI) cycle. The new regulation still requires annual inspections, which are to be conducted within 3 months before or after each anniversary date of the COI. The inspection and oversight procedures put forth in this guide take into account this new regulation.

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## B. How it works

This is an optional program for companies that own and operate unmanned U.S. flag tank barges. To truly appreciate the TAIP, it is important to understand what it is and what it is not, how it works, and what are the goals and benefits of the program.

The authority for the TAIP program was derived from the Coast Guard Authorization Act of 1996. By adding 46 U.S.C. § 3103 and amending § 3308 and § 3714, Congress gave the Coast Guard flexibility to allow companies to conduct self-inspection programs. Furthermore, the definition of a “*marine inspector*” in 46 CFR 30.10-43 states that the OCMI may designate someone other than a Coast Guard Marine Inspector to carry out vessel inspections. Exercising this discretion, an OCMI may designate qualified individuals from within a responsible and well-managed barge company to perform the annual “topside” inspections required by 46 CFR 31.10-17. These designated individuals may also be authorized to oversee and approve temporary repairs for minor damage. This streamlining effort, though not entirely a self-inspection program, meets the Coast Guard objective to ensure regulatory compliance while meeting the industry desire for reduced delays and maximum flexibility of their operational schedule.

The significant difference between TAIP and the traditional inspection program is in the *process* of how compliance is ensured. The TAIP is an alternative process for ensuring compliance with the regulations, where Company TAIP Examiners conduct the annual inspections of the barges. These Company TAIP Examiners undergo a qualification process and receive a Designation Letter from the Coast Guard. The Coast Guard performs annual oversight on companies enrolled in this program by conducting an administrative review of the company’s TAIP paperwork, inspections on 20% of the company’s barge fleet, and an audit of all designated Company TAIP Examiners. In addition, the Coast Guard conducts the Inspection for Certification every 5 years, along with all required Drydock, Internal Structural, and Cargo Tank Internal Exams.

Companies participating in the TAIP program are required to develop and implement an OCMI-approved Company Action Plan (CAP), and a Tank Barge Action Plan (TAP) for each barge, which describe their inspection management system and provide specific inspection procedures to ensure enrolled barges are maintained in compliance with the regulations. The OCMI shall designate in writing each individual from the company who has demonstrated the knowledge and competence to perform the annual “topside” inspections, which they shall carry out in accordance with the CAP and TAPs. The CAP and TAPs will:

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- (1) Stipulate the company's commitment to a partnership with the Coast Guard to ensure the tank barges are maintained in compliance with the regulations.
- (2) Identify the responsibilities of company personnel to ensure that this commitment is fulfilled, identify the specific tank barge systems that will be examined, and specify:
  - When to conduct the inspections,
  - What to look for,
  - How to document the inspections, and
  - How to report and correct any deficiencies.

The company will develop these plans under the guidance of a USCG TAIP Advisor, who will assist the Company TAIP Representative to fully understand how the TAIP is supposed to work.

TAIP is not entirely a "self-inspection" program, since the Coast Guard retains certain inspection responsibilities and the company is subject to fairly rigorous Coast Guard oversight. However, under TAIP the Coast Guard Marine Inspector's primary focus will be to review the implementation and management of the TAIP program by the company.

## C. Enrollment Process

Enrollment in TAIP involves a four-phase process:

- I. **Phase One: Application.** The company performs a self-evaluation and then submits a written request to the cognizant OCMI to be considered for TAIP enrollment. The OCMI will review the operational history and inspection records for the company and its barge fleet over the last 3 years to determine if they are in fact a good candidate for the TAIP.
- II. **Phase Two: Plan Development.** After a satisfactory review of the company's inspection history, the OCMI will assign a TAIP Advisor to provide guidance to the Company TAIP Representative who is responsible for developing the required action plans (CAP and TAP(s)).
- III. **Phase Three: Program Implementation.** Once the CAP and TAP(s) have been completed and approved, each "Company TAIP Examiner" shall be trained and obtain a designation letter, and a mutually agreed upon



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trial period will be conducted for the company to implement its TAIP program and the Coast Guard to evaluate the program. The trial period will be used to determine if the CAP and TAPs are suitable; to ensure that the Company TAIP Examiners can properly perform their inspection duties; and to test the company's management practices to see that the inspections are being satisfactorily completed and all discrepancies are being tracked and promptly corrected.

- IV. Phase Four: Enrollment.** At the end of the trial period, and at the request of the company, the USCG TAIP Advisor will conduct a TAIP Oversight Inspection, assisted by the Company TAIP Representative, to evaluate the company's TAIP program. If satisfactory, the OCMI will endorse the COI of each tank barge to indicate its enrollment in TAIP.

#### D. Goals and Benefits

The goal of the TAIP program is to develop and implement a program that will benefit both the barge industry and the Coast Guard. This program not only empowers barge companies to conduct all annual inspections, but also, for inland tank barges, it allows companies to make minor temporary repairs and proceed with their voyage without having to obtain Coast Guard approval. This program should reduce costly delays for the barge industry as well as to reduce unnecessary workload and travel expenses for the Coast Guard, while still ensuring regulatory compliance for all tank barges with no compromise to safety.

Some benefits that have been realized by companies participating in the prototype program include:

- Increased scheduling flexibility and reduced operational delays,
- Better management of vessel conditions and costs,
- Increased involvement and "ownership" by company personnel in the safe operation of their vessels.

#### E. Conclusion

TAIP will be a "win-win" program for the barge industry and the Coast Guard. It embraces the Coast Guard's marine safety management principles of

- *Prevention Through People (PTP),*

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- *Partnerships for Quality, and*
- *Risk Management.*

The Coast Guard has championed these initiatives because it recognizes that company personnel play the primary role in ensuring the safe operation of their vessels. These initiatives challenge the Coast Guard to establish partnerships with those it regulates, develop effective and realistic solutions to safety concerns, prioritize its resource usage in response to risk, and design programs that effectively minimize risk.

For any questions, please contact the Eighth Coast Guard District's Marine Safety Division, D8(m), at (504) 589-6271.

**NOTE:** Nothing in this guide is intended to prevent small entities' from participating in this program. This guide identifies tasks, positions and documentation in sufficient detail to illustrate the concepts, principles and goals for enrollment and participation. Companies, including those with very small operations, can meet the conditions of participation in a variety of ways, subject to the acceptance of the OCMI. (E.g. small companies may choose to assign several duties to a single individual, condense and simplify the required documentation, and/or minimize inspection tasks to the extent appropriate for the specific barge equipment).

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## **II. DEFINITIONS**

The following is a list of definitions for common terms found throughout this Guide.

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### **Cargo Residue:**

That portion of the cargo remaining aboard a barge after its contents have been unloaded to the maximum extent practicable utilizing normal offloading procedures, and before the barge is either refilled or cleaned of the residual cargo and purged to remove hazardous vapors.

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### **Casualty:**

Same as a “Marine Casualty” or “Accident,” as defined in Title 46, Code of Federal Regulations (CFR), Subpart 4.03-1.

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### **Civil penalty:**

A fine that is assessed for a violation of federal law, processed under the provisions of 33 CFR 1.07 and 33 CFR 20.

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### **Company:**

The owner of the tank barge, or any organization or person such as an operator, manager, or bareboat charterer, who operates a tank barge under the provisions of TAIP.

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### **Company Action Plan (CAP):**

A document describing a company’s organization, responsibilities, and management policies that is required for participation in the TAIP, and which must be approved by the Coast Guard.

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### **Company TAIP Examiner:**

An individual authorized by the Coast Guard to conduct annual inspections of the company’s tank barges and approve temporary repairs (providing they comply with the provisions of Section VII of this Guide). This individual must be approved and designated in writing by the Coast Guard (specifically, by the TAIP Homeport OCMI).

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### **Company TAIP Representative:**

The Company’s primary contact point for TAIP. This individual is responsible for such things as the development and implementation of the Company Action Plan (CAP) and Tank Barge Action Plans (TAPs), and has the authority to bind the company to the terms of these plans. This individual has the overall responsibility to see that the company and its barge fleet conform to all aspects of the TAIP.

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**Correction Report (CR):** A document that identifies specific vessel deficiencies, and that is used by the Company to record their corrective actions. Correction Reports will identify the specific deficiency, the date it was identified, the corrective measure taken, the repair date, and the source/vendor or person making the correction. (see Appendix B of this Guide)

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**Documented Deficiency:** Means a discrepancy that has been documented in a Coast Guard record (CG-835 form), in which the condition of a tank barge, its equipment, or its operation was not in compliance with the federal regulations.

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**Examination Checklist (EC):** A form that lists all the systems and subsystems that must be examined during an annual inspection, and which allows the Company TAIP Examiner to record whether each item is "O.K." or "Not O.K." This checklist is incorporated in the approved TAP for each tank barge. (see Appendix A of this Guide)

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**Inspection Criteria Reference (ICR):** Forms contained in a TAP that provide detailed guidance on how to inspect each specific item on the tank barge that is required by regulation to be inspected. (see Appendix D of this Guide).

ICRs shall include:

- Specific reference to the relevant CFR cites.
  - Detailed, step-by-step explanation of the inspection criteria and/or performance standards.
  - Outline of the actions to be taken when a deficiency is discovered during an annual inspection.
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**Repair:** An action taken by an owner, operator, or other responsible party to restore a damaged barge, or its appurtenances, to full fitness for service, or to correct an observed change in material condition. The damage and/or changes in material condition can include, but are not limited to, wastage, fracturing, puncturing, tearing, holing of plate, frames, piping, supports, brackets, flanges, valves, or weldment.

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**Reportable Casualty:** A marine casualty or accident that is of a severe enough nature that notice to the Coast Guard is required, as per 46 CFR 4.05-1.

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**TAIP Homeport OCMI:** The OCMI that enrolls a company and its barge fleet into the TAIP (i.e., approves the CAP and TAP(s), designates the Company TAIP Examiners, conducts the operational evaluation, etc).

**TAIP Oversight:** The systematic process in which a Coast Guard Marine Inspector reviews the Company's required TAIP documentation, conducts on-board inspections of random tank barges, and audits the Company TAIP Examiners. TAIP Oversight is to focus on how well the Company is complying with the provisions of the TAIP, and how well their barge fleet is being maintained in a state of regulatory compliance. Detailed guidance on TAIP Oversight is provided in Section VI of this Guide, and in the Coast Guard TAIP Oversight Form (a generic example of this form is provided in Appendix C of this Guide).

**Tank Barge:** A nonself-propelled tank vessel (see the definitions in 46 CFR 30.10-65 and 30.10-69).

**Tank Barge Action Plan (TAP):** A document that prescribes the procedures for conducting the annual inspection of a tank barge; including procedures for documenting the inspection and correcting any deficiencies noted. This document must be approved by the Coast Guard.

**Tank Barge Alternate Inspection Protocol (TAIP):** The alternative inspection program described in this guide.

**Unmanned Tank Barge:** A nonself-propelled tank vessel (see the definitions in 46 CFR 30.10-65 and 30.10-69), that does not transport passengers, crew, "other crew," nor "persons in addition to the crew;" and is not required by the Certificate of Inspection to maintain any primary lifesaving equipment on board for such personnel.

**USCG TAIP Advisor:** A Coast Guard Marine Inspector assigned by the Officer in Charge, Marine Inspection (OCMI) to assist the Company in the development and implementation of their TAIP program. This is the Coast Guard's counterpart to the Company TAIP Representative.

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**Violation:**

An incident where a breach of federal law is documented, processed as either a civil or criminal penalty case, and at the conclusion a penalty is assessed. See “Civil Penalty.”

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### **III. ENROLLMENT PROCESS**

The following steps must be completed to enroll a company and its barge fleet in the TAIP program. These steps are explained in detail in this section, and illustrated in the flowchart provided as Figure 1 on page 24.

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#### **PHASE ONE - Application**

- Step A*     Company Self-Evaluation
- Step B*     OCMI Evaluation

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#### **PHASE TWO - Plan Development**

- Step C*     Assignment of USCG TAIP Advisor
- Step D*     Development of Company Action Plan (CAP)
- Step E*     Development of Tank Barge Action Plan (TAP)
- Step F*     Approval of CAP and TAP(s)

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#### **PHASE THREE – Program Implementation**

- Step G*     Training & Designation of “Company TAIP Examiners”
- Step H*     Operational Evaluation of Company's TAIP Program

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#### **PHASE FOUR - Enrollment**

- Step I*     Enrollment
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**PHASE ONE:**  
**Application**

The following criteria will provide the company and the OCMI a means to determine the company's eligibility and readiness to enter into the TAIP. The company must show they are a proactive, responsible, and well-managed company with a good inspection history and a commitment to safety. While all the criteria below must be met, the degree to which it is met will depend on the company size and the nature of its barge fleet. The company's history of regulatory compliance, the condition of its barges, and its record of violations will all be considered.

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**A. Company  
Self-Evaluation**

Prior to contacting the Coast Guard to request enrollment in the TAIP program, the company must perform a self-evaluation and determine that it is in fact a good candidate for this program. The company must be prepared to provide the following information and documentation to the Coast Guard:

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*1. Organizational  
Commitment*

- A statement signed by the company's senior officer attesting to the company's commitment to enter into an ongoing partnership with the Coast Guard in marine safety.
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*2. Responsibility and  
Authority*

- An organizational chart of the company.
  - Defined, documented, and delineated responsibilities, authorities, and interrelations of all personnel who will manage, perform, and verify any work relating to the tank barge inspection processes.
  - Documentation that there is adequate staffing and support for tank barge inspections and maintenance.
- 

*3. Regulatory  
Compliance*

- Documentation that the company has been diligent and proactive by conducting pre-inspections on its barges.
- Documentation that the personnel conducting the pre-inspections are empowered to initiate corrective actions.
- Documented tank barge maintenance and equipment records (i.e., servicing records for machinery, safety and, firefighting equipment, etc.).



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- Documentation that the company has a tracking system to ensure regulatory compliance (i.e., a tracking system for deficiencies, inspection due dates, etc.).

#### 4. Application

**NOTE:** A barge participating in the Alternate Compliance Program (ACP) will have to be disenrolled from ACP if it is enrolled in the TAIP (see pg. 38).

- After the company has evaluated itself, collected all the pertinent information and documentation, and believes it is ready to enter into the TAIP, a formal written application must be made to the cognizant OCMI. It is recognized that the company headquarters and business offices may not be located in the same region where the majority of its barges operate. If there is any question as to which OCMI should process the company's application and assist with the TAIP enrollment process, the Eighth Coast Guard District's Marine Safety Division should be consulted.

### B. OCMI Evaluation

The decision of whether or not to enroll a company in the TAIP will be made by the OCMI after considering the criteria listed below. The OCMI is reminded that the TAIP is not suitable for every company, and unless it is clear that the company is proactive, responsible, and well managed then it shall not be allowed to enroll and participate in the program. This program is intended for companies, regardless of size, with an absolute commitment to safety and which employ capable and dedicated maintenance and operations personnel.

#### 1. Operational History

A satisfactory three-year operational history is required for any company seeking enrollment in the TAIP. The company should have operated an inspected tank barge or fleet of tank barges for at least three consecutive years.

**NOTE:** If a company already enrolled in the TAIP acquires a new tank barge (a new construction or previously owned barge), the new barge may be enrolled in TAIP as soon as it is issued a new COI.

If a pattern of any of the following deficiencies is revealed when reviewing the operational history of the company's tank barges, the company shall be disqualified from enrollment in the TAIP:

- Insufficient number of serviceable fire extinguishers as required by the COI,
- Unauthorized modifications of structural arrangements,
- Unauthorized modifications of equipment or structural arrangements that could have resulted in a pollution incident,

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- Failure to maintain watertight boundaries,
- Intentional override of any electrical or mechanical safety system or shutdown device, or
- Significant noncompliance with federal requirements not otherwise described, that give the Coast Guard credible concerns about the applicant's commitment to safety.

## 2. *Inspection Reports*

A review of MSIS or MSN cases for the company's tank barge fleet over the past 3 years shall be conducted. Particular attention shall be paid to the inspection narratives to obtain an overall impression of how well the company maintains its tank barges and how responsive it is when deficiencies are found. Interviews with Marine Inspectors who have worked with the company and have been on the barges will also assist in evaluating the suitability of the company for participation in the TAIP.

## 3. *Verification of Company's Safety Commitment and Suitability for TAIP*

The OCMI will make a determination on the company's commitment to safety and suitability for enrollment into the TAIP after reviewing the company's:

- Administrative records,
- Operational and managerial processes and policies,
- Operational and inspection history, and
- By evaluating the physical condition of the tank barge(s).

When the OCMI is satisfied that the company is qualified to enter the TAIP, the OCMI will notify the company and assign a USCG TAIP Advisor to assist the company with the enrollment process.

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**PHASE TWO:**  
**Plan Development**

Once the Coast Guard has determined the company is eligible for the TAIP, the company will be permitted to enter the plan development phase. At this time the company must develop a Company Action Plan (CAP) for their organization. They must also develop a Tank Barge Action Plan (TAP) for each barge, although one TAP may be adequate to cover a “class” of similar barges.

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**C. Assignment of  
USCG TAIP Advisor**

Each OCMI shall designate at least one person to be the USCG TAIP Advisor for their inspection zone. This Advisor shall be a Marine Inspector who is thoroughly familiar with the TAIP policies and procedures put forth in the Eighth Coast Guard District’s policy letter and this Guide. They should be prepared to assist any company seeking enrollment and participation in the TAIP.

The USCG TAIP Advisor will assist the company in assembling the requisite action plans, and with all other aspects of developing the company’s TAIP program. The USCG TAIP Advisor shall hold an initial meeting with the Company TAIP Representative to discuss the development and implementation of the action plans, and shall be accessible to the Company TAIP Representative whenever questions on the TAIP arise.

While the USCG TAIP Advisor will not create a TAIP program for the company and will not develop their action plans, it may be appropriate for the USCG TAIP Advisor to perform an initial review the company’s necessary safety, training, and environmental programs. The USCG TAIP Advisor shall provide oversight and feedback to the Company TAIP Representative during the development of the Company Action Plan (CAP) and each Tank Barge Action Plan (TAP). Ultimately, the USCG TAIP Advisor will decide when these plans are acceptable and complete, and will then forward them to the OCMI with a recommendation for approval. Since there is no “universal” TAIP program that will work for every company, the USCG TAIP Advisor will need to ensure the company develops and implements a program where the company’s inspection and management practices will ensure the barges are maintained in a continual state of regulatory compliance.

If the Company TAIP Representative is unsatisfied with the service provided by the USCG TAIP Advisor, they should contact the TAIP Homeport OCMI to resolve the situation.

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**D. Development of  
Company Action  
Plan (CAP)**

The CAP is the document that identifies the management policies and practices the company will use to adopt the TAIP. When developing the CAP, the Company TAIP Representative is responsible to ensure it contains the following.

1. A copy of the OCMI's approval letter for the CAP (once the CAP is approved).
2. A statement signed by a corporate officer authorized to commit the company to a partnership with the Coast Guard, assuring safe operation of the company's tank barge(s).
3. A company organization chart that includes the name of the Company TAIP Representative and any support personnel who will be responsible for implementation and oversight of the approved CAP and TAP(s).
4. A statement describing the responsibilities and authorities of personnel involved in the inspection and maintenance of the tank barge(s) for the company.
5. A description of the method or system used to initiate corrective action when deficiencies are found.
6. A description of the process for periodic review and update of this document.
7. A description of the company's safety program.
  - a. Adequate written safety plan/policy/procedures.
  - b. Designated Safety Officer.
  - c. Procedures for reporting and investigating accidents.
  - d. Established mechanism for corrective actions following reported accidents.
  - e. Strict adherence to drug and alcohol programs:
    - (1) Policy for employees that do not submit to a required test in a timely fashion,
    - (2) Policy/procedures for facilitating and documenting attempts to contact employees by the Medical Review Officer, and
    - (3) Designated person (or organization) with knowledge of the program who maintains an up-to-date file of the applicable regulations.

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8. A description of the company's environmental protection program.
  - a. Strict adherence to all environmental protection programs. Established company policy on reporting, responding to, and preventing prohibited discharges.
  - b. Employee awareness of environmental protection issues.
9. A description of the company's training program, including the method used to track and record training for individual employees, and the training required for the Company TAIP Examiners to conduct annual inspections.
  - a. Established training infrastructure.
  - b. Designated Training Officer.
  - c. Documented training records.
10. A master list of all TAIP documents and ICRs that the company intends to use in its TAP(s).
11. A master list indicating which TAP applies to which barge.

#### **E. Development of Tank Barge Action Plan (TAP)**

A TAP is the document the Company TAIP Examiner will use to conduct the annual inspection on a tank barge. There must be one TAP provided for each barge, and each TAP should be specifically tailored for inspecting that particular barge, taking into account how it is constructed, arranged, and equipped. However, one generic TAP may be adequate to cover a "class" of similar barges. Each TAP should include any pertinent inspection information, and shall at a minimum include the following tank barge specific letters, forms, and documents:

1. A copy of the OCMI's approval letter for the TAP (once the TAP is approved).
2. Examination Checklist (EC)
3. Correction Reports (CR)
4. Inspection Criteria Reference (ICR) for a Tank Barge

Specific guidance on the required forms and documents for the TAP is provided below:

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1. Exam Checklist (EC):

The EC is the working document used by a Company TAIP Examiner to conduct the annual inspection of a tank barge and all its systems. The EC lists all of the systems and subsystems that are required to be inspected, and for each one it provides a reference number corresponding to the appropriate procedure in the Inspection Criteria Reference (ICR) for inspecting that system or subsystem. During the inspection, the Company TAIP Examiner will indicate on this form whether each system is “OK” or “NOT OK.”

➔ Examples of a generic EC form, one that is blank and one that is completed, are provided in Appendix A of this Guide.

2. Correction Report (CR):

The Correction Report (CR) is used to document each deficiency that is discovered by a Company TAIP Examiner during an inspection, regardless of whether it is corrected at that time or remains outstanding.

**CRITICAL NOTE:**

Corrective action is required prior to placing the barge back in service for any deficiencies that pose a spill potential or hazard to navigation. Other deficiencies, which do not directly effect the safety of the tank barge, should be corrected as soon as practical, but generally within 30 days.

The CR lists:

- The inspection date (date the deficiency is discovered),
- The corresponding ICR number (which can be obtained from the EC or ICR),
- A detailed description of the deficiency,
- The required correction date, in accordance with the ICR or TAP, and
- The corrective action planned, taken, and the date corrected.

Correction Reports become a vital part of the company’s TAIP documentation, and can be instrumental in identifying and correcting recurring problems with the tank barge systems and subsystems. They should be retained on file by the company for at least 2 years, to identify and track any trends with barge deficiencies.

➔ Examples of a generic CR form, one that is blank and one that is completed, are provided in Appendix B of this Guide.

3. Inspection Criteria Reference (ICR):

The ICR is the primary reference source for Company TAIP Examiners when conducting the annual inspections. It provides a detailed description of the specific inspection procedures for each vessel system and subsystem. These procedures are referenced on the Examination Checklist using a identification number

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corresponding to a specific ICR procedure. The ICR shall be kept current with the federal regulations, and should be reviewed annually and revised as necessary.

The ICR is organized by systems and subsystems, and has a table of contents to indicate the identification number for each system and subsystem. Each individual ICR sheet contains:

**CRITICAL NOTE:**

The ICR enclosures to this Guide should not be assumed to contain all systems required to be examined for every possible tank barge configuration. It is incumbent upon the Company to ensure that their TAP identifies all systems that apply to their tank barge(s).

1. System name,
2. Subsystem name,
3. Person responsible for performing the tests and/or inspections,
4. Applicable references,
5. Required inspection interval (minimum regulatory verification frequency),
6. Specific inspection criteria (step-by-step procedures), and,
7. Required corrective action for when deficiencies are found.

In the course of the company's TAIP development, should a system be identified that is not covered by an existing ICR, the company must work with the USCG TAIP Advisor to develop an additional sheet in the ICR for this system.

➔ The ICR for Tank Barges (Subchapter D/O) is provided in Appendix D of this Guide.

**NOTE:** Whenever a new ICR sheet is developed, a copy shall be forwarded by the USCG TAIP Advisor to CCGD8(m) so it can be included in any updates to the TAIP Guide.

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**F. Approval of  
CAP & TAP(s)**

The completed action plans (CAP and TAP(s)) shall be submitted to the OCMI for review. If found satisfactory, the OCMI shall issue an approval letter for the CAP and each TAP, and the Company will then be permitted to enter Phase III, "Program Implementation."

If the CAP or TAP(s) are missing any key elements or need to be modified or revised in any way, they will be returned to the company with a letter indicating which specific sections are missing or require revision. Once any deficiencies have been addressed, the action plans shall be re-submitted to the OCMI for approval consideration.

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**PHASE THREE:**  
**Program Implementation**

The company will implement its TAIP program and undergo an operational evaluation period to determine if the CAP and TAP(s) are suitable; to ensure that company's designated inspectors can properly perform their inspection duties; and to test the company's management practices and see that the inspections are being satisfactorily completed and all discrepancies are being tracked and promptly corrected in accordance with the TAP.

The company will enter the Program Implementation phase of the TAIP enrollment process upon receipt of the OCMI's written approval of the Company Action Plan and Tank Barge Action Plan(s). Specific elements of this phase of the enrollment process include:

- Training & Designation of "Company TAIP Examiners"
- Operational Evaluation of Company's TAIP Program

**G. Training &  
Designation of  
"Company TAIP  
Examiners"**

Any properly trained and qualified individual within a barge company who is authorized by the OCMI to conduct the annual "topside" inspections and approve temporary repairs shall be designated a "Company TAIP Examiner." The Company TAIP Representative can serve as a Company TAIP Examiner, but others may also be qualified and designated as such. Once the OCMI is satisfied that an individual is properly trained and qualified, the OCMI shall issue a letter to designate them as a Company TAIP Examiner. To qualify in this capacity, the USCG TAIP Advisor will conduct testing of potential Company TAIP Examiners to verify their ability to satisfactorily perform the designated inspection tasks per the CAP and TAP. Also, each Company TAIP Examiner must either:

**NOTE:** Companies that employ outside (third-party) contractors to maintain certain barge systems/subsystems need to be able to verify the competency of the contractor to perform the task.

- (a) Demonstrate satisfactory completion of appropriate sections of the Coast Guard Barge Inspector (BI) Marine Safety Training and Qualification booklet,
- (b) Demonstrate satisfactory completion of an equivalent qualification booklet, developed by the company and approved by the OCMI, or
- (c) Already have demonstrated competency as an inspector under a prototype Streamline Inspection Program.

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The USCG TAIP Advisor will evaluate the company's training program to ensure it adequately prepares the responsible personnel to satisfactorily perform their inspection tasks under TAIP. The USCG TAIP Advisor will do this by performing the following tasks:

- Review training materials,
- Attend training sessions, and
- Provide the Company TAIP Representative with feedback and recommendations on their training program.

#### **H. Operational Evaluation of Company's TAIP Program**

During the Operational Evaluation period the Company's CAP and TAP(s) will be put to use by the Company TAIP Examiners:

- The tank barge company must operate and be examined under the CAP and TAP for at least one inspection cycle. Representative barges shall be inspected to show that these plans are adequate, and have completed Exam Checklists to document these inspections.
- During this operational evaluation, the Coast Guard TAIP Advisor will conduct an ongoing evaluation of the tank barge company's operation for compliance with the CAP and TAP. For guidance on monitoring frequency see Section IV, Part D of this Guide.
- The Coast Guard TAIP Advisor will report periodically to the TAIP Homeport OCMI and the Company TAIP Representative on the tank barge's performance, and
- Based on observations, make recommendations for
  - Improvement(s), if needed, or,
  - Enrollment, if satisfactory.

**CRITICAL NOTE:** Revisions required as a result of the findings during the Operational Evaluation may necessitate additional time under evaluation to determine if the revisions have successfully addressed the problem(s).

All revisions to the CAP or TAP must be satisfactorily addressed prior to enrollment.

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**PHASE FOUR:**  
**Enrollment**

Once the OCMI is satisfied with the company's TAIP program, the OCMI will enter an endorsement on the Certificate of Inspection (COI) for each barge to indicate it is enrolled in the TAIP program.

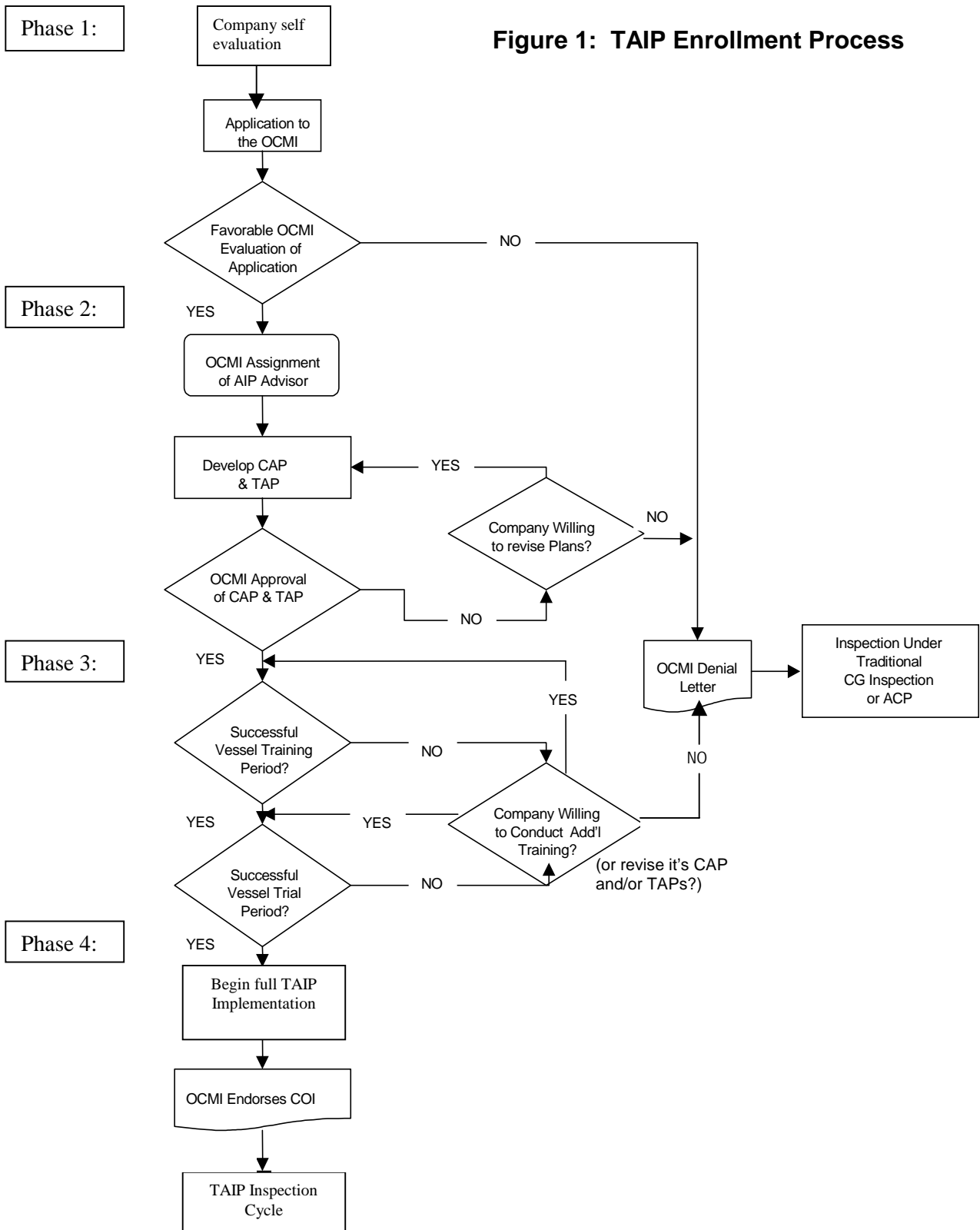
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**I. Enrollment**

Use Figure 1, page 23, to ensure a successful TAIP enrollment process has been completed. Following a successful trial period, the local OCMI may authorize full implementation of the TAIP by endorsing the Certificate of Inspection of participating tank barges as follows:

"THIS TANK BARGE IS PARTICIPATING IN THE EIGHTH COAST GUARD DISTRICT'S TANK BARGE ALTERNATE INSPECTION PROTOCOL (TAIP) PILOT PROGRAM. INSPECTION ACTIVITIES ABOARD THIS BARGE SHALL BE CONDUCTED IN ACCORDANCE WITH ITS TANK BARGE ACTION PLAN (TAP). INSPECTION ISSUES CONCERNING THIS BARGE SHOULD BE DIRECTED TO [NAME OF TAIP HOMEPORT OCMI]."

Once enrolled, the company will conduct the annual inspections required by 46 CFR 31.10-17 for all its barges. Details on inspection and annual oversight procedures for barges enrolled in the TAIP program are provide in Sections V and VI of this Guide.



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#### **IV. PROGRAM ADMINISTRATION**

This section provides an overview of how the TAIP program is to be administered.

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##### **A. Company Responsibilities**

The following is a listing of some of the overall responsibilities that the Company shall fulfill to ensure successful implementation and participation in the TAIP program.

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##### **1. Development of Action Plans**

- Ensure that the ICR is available and contains applicable criteria for every tank barge system and subsystem required by Coast Guard regulations (international certificates will continue to be administered by the USCG or its authorized issuing organization).
  - Ensure that the Company TAIP Representative establishes and maintains close communications with the USCG TAIP Advisor.
  - Submit the CAP and TAP to the OCMI for review and approval.
- 

##### **2. Training of TAIP Personnel**

- Develop a company training curriculum which addresses the skills necessary to carry out all TAIP functions.
  - Provide training to all company personnel involved with TAIP, based upon their respective positions and responsibilities.
  - Specifically ensure Company TAIP Examiner(s) are provided the training necessary to carry out all activities associated with ICR and Exam Checklists.
  - Establish training records for each company person involved with TAIP.
  - The Company TAIP Representative must ensure that all company personnel involved with TAIP are afforded the time necessary to conduct and/or participate in training.
  - Adjust the training curriculum as necessary to address problems discovered during examinations or CG inspections, changes in company personnel, or changes in relevant tank barge systems and subsystems.
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### 3. Forms Management

**NOTE:** All listed forms shall be made available to any Coast Guard representative upon request and during annual Coast Guard oversight exams. Forms should be kept on file for at least **2 years**.

- Exam Checklist: Contained in each TAP, completed by Company TAIP Examiner(s), and maintained (kept on file for 2 years) as part of the TAIP documentation by the Company TAIP Representative.
- Correction Report: Contained in each TAP, completed by Company TAIP Examiner(s) as necessary, and maintained (kept on file for 2 years) as part of the TAIP documentation by the Company TAIP Representative
- Inspection Criteria Reference (ICR): Contained in each TAP for reference by the Company TAIP Examiner(s), and periodically reviewed and updated as necessary by the Company TAIP Representative.
- Monthly Report to OCMI: The company shall submit a monthly report to the TAIP Homeport OCMI. The report will include a list of barges whose anniversary date for annual inspections are due within the next 30-60 days. Additionally, it shall include a list of barges that had an exam completed by the Company TAIP Examiner(s) within the previous 30 days. This list will be accompanied by a copy of the Exam Checklist for each barge examined.

## B. Coast Guard Responsibilities

The following is a listing of some of the overall responsibilities that the Coast Guard shall fulfill to assist companies with implementation and participation in the TAIP program.

### 1. TAIP Homeport OCMI

- Facilitate program knowledge in area of responsibility.
- Act as CAP and TAP approval authority.
- Issue Designation Letters to Company TAIP Examiners.
- Exercise waiver authority, when waiver request deemed to be valid.
- Ensure that proper process controls and measurement take place to monitor and constantly evaluate the progress and performance of companies participating in the TAIP.
- Ensure USCG TAIP Advisors receive appropriate training, time management and empowerment to fulfill their duties.
- Ensure USCG TAIP Advisors make the appropriate cultural adjustment to provide proactive customer service.
- Ensure remedial action is taken in a timely manner to keep TAIP applicants and enrollees on-track.

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- Act on USCG TAIP Advisor recommendations for remedial actions and disenrollment.
- Issue COIs on or before the expiration date of the current COI.
- Collect and input required inspection data into the Coast Guard Marine Safety Database (e.g., currently MSIS, later to be MSN).
- Coordinate, as circumstances warrant, with District (m).

## 2. USCG TAIP Advisor

The USCG TAIP Advisor is the primary Coast Guard point of contact for the company and tank barges. He/she is directly responsible for the administration of the program. The USCG TAIP Advisor's responsibilities are:

**NOTE:** The USCG TAIP Advisor is not a billeted position. Rather, the OCMI will assign this to a Marine Inspector as a collateral duty. A unit may have more than one TAIP Advisor, depending on the size of its TAIP fleet.

1. To cooperate with the company, and maintain customer focus.
2. Be a proactive participant in program monitoring, with the frequency and in the spirit outlined in this guide.
3. Provide the necessary feedback to the OCMI on individual company and tank barge TAIP progress.
4. Identify opportunities for program improvement.
5. Alert the OCMI concerning any remedial actions, possible disenrollments or appeals.
6. Confer with the OCMI to receive any feedback from companies who may have called.
7. Communicate with and coordinate inspections with other OCMI zones, to see that proper TAIP program oversight is maintained for all enrolled tank barges.

## 3. Eighth Coast Guard District Marine Safety Division

- Maintain this TAIP Guide and publish appropriate and timely updates.
- Manage the program at the district level.
- Analyze program data and implement adjustments.
- Review and take action on appeals regarding TAIP issues.
- Ensure all OCMI's are provided the necessary training to effectively promote and administer the program.

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**C. Shared  
Responsibilities**

As an interactive, ongoing program there are any number of responsibilities shared by the company and the Coast Guard.

*1. Initial enrollment*

Initial enrollment involves the first-time application and screening process for entry of a company and its tank barges into the TAIP. Particular attention must be given to the development of ICRs necessary to cover tank barge unique systems or subsystems. This process was covered in "Enrollment Process," Section III.

*2. Tank barge  
Reinstatement*

A tank barge may be reinstated following disenrollment, either voluntarily or involuntarily, provided:

1. The tank barge does not change ownership in the interim,
2. The tank barge and company remain, or return to being, eligible for enrollment in TAIP,

*3. Tank barge Re-  
enrollment*

The process of "re-enrollment" applies to scenarios where the ownership of the tank barge has changed. The re-enrollment may involve all or part of the Enrollment Process outlined in Section III.

*4. Changes in Ownership  
Issues*

A tank barge may be automatically re-enrolled in TAIP after a change in ownership, provided:

**NOTE:** For changes of ownership, which involve the transfer of a tank barge from a non-TAIP company to a participating TAIP company, or acquisition of a newly constructed/certificated tank barge, the new owner may enroll the tank barge upon approval of the TAP by the cognizant OCMI. **Any other scenarios will necessitate compliance with all provisions of Section III, "Enrollment Process."**

- (a) The previous owner participated in TAIP with one or more tank barges;
- (b) At the time of the sale the tank barge was an active TAIP participant;
- (c) The new owner is an active participant in TAIP at the time of the sale; and,
- (d) The new owner receives approval from the cognizant OCMI for a revised TAP that is consistent with the new owner's CAP.

*5. Appeals of Coast Guard  
Decisions/Actions*

Appeals of OCMI decisions will be made in accordance with the provisions of 46 CFR 1.03 - Rights of Appeal.



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#### **D. Monitoring Frequency**

“Monitoring” refers to opportunities for Coast Guard and company interaction, above and beyond the specific inspections required by the regulations and the specific activities required for TAIP Oversight.

The appropriate frequency of monitoring is dependent on a number factors, including:

1. The stage of a company’s TAIP development;
2. Assessment of performance indicators which point toward remedial action; and,
3. Any changes in tank barge operations.

It is expected that the most frequent monitoring will occur from the company’s initial application through the trial period.

Monitoring is the opportunity for the USCG TAIP Advisor to assist the company with the development of its TAIP. It is not to be taken as reason to initiate a formal Coast Guard vessel inspection or TAIP Oversight. Therefore, during typical monitoring the USCG inspector should not take any enforcement action unless a major deficiency is discovered. The USCG TAIP Advisor should seek to correct any deficiencies noted through the mechanism provided in the Company’s action plans (CAP and TAP).

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#### **E. Database Entries**

It is critical that TAIP tank barges are tracked consistently and in a manner where they can be compared with those tank barges operating under the traditional inspection program. While the Coast Guard Marine Safety program’s new database, the Marine Safety Network (MSN), is being developed it will be necessary for TAIP activity to be documented in the existing Marine Safety Information System (MSIS) database. When MSN comes on-line there will be a special field allocated for alternative inspection programs. Tank barges enrolled in the TAIP will be identified by this special field, so that data can be queried on the TAIP fleet separate from, or in comparison to, the traditionally inspected fleet. Additional instructions will be promulgated in the future as tracking, measurement, and migration to the MSN database continues.

The annual inspections conducted by the Company TAIP Examiners and the annual Coast Guard oversight inspections will need to be documented in the Coast Guard’s vessel inspection database, both to document the inspections and update the vessel inspection status. For annual inspections by the Company TAIP Examiners, an administrative MSIS case will be generated once the OCMI receives documentation (a monthly report or the

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individual Exam Checklists) that these annual inspections were completed and barges are in a satisfactory condition. For Coast Guard oversight inspections, an entry will be made to account for the time and provide a brief narrative statement about the scope and findings of the oversight inspection.

Generally, inspection deficiencies shall not be entered in the Coast Guard's vessel inspection database unless serious deficiencies are found that dictate Coast Guard follow-up.

For companies with barges operating in more than one OCMI inspection zone, each OCMI that conducts an inspection or oversight activity on any of the barges will make an appropriate database entry to document their action. See Section VIII, Part F for additional guidance on barges operating in multiple OCMI zones.

For barges being enrolled in the TAIP program, it is important that the TAIP endorsement is entered on the COI precisely as shown in Section III, Part I. The USCG TAIP Advisor will enter the endorsement on the COI, along with any other relevant information.

## **F. TAIP Measurement Plan**

It is important that the TAIP be evaluated to determine its success in achieving program goals, identify any inefficiencies that need improvement, and evaluate the level of regulatory compliance for TAIP tank barges compared to tank barges operating under the traditional inspection program. For this reason, specific measurement criteria of the Program's effectiveness will be developed and reviewed. Currently, field personnel are instructed to enter all relevant inspection-related data for TAIP tank barge in an identical manner as non-TAIP tank barges.

OCMIs shall ensure the MSIS/MSN data entry requirements of the previous section are performed. CCGD8(m) shall analyze MSIS/MSN data for trends and take appropriate actions based on those findings.

**NOTE:** Deficiency reporting procedures specified in Marine Safety Manual Vol. II, 3.C.3.g shall be used for capturing deficiency data. This information is to be entered in the MSDS product set of MSIS, or its future replacement in MSN. However, only major safety deficiencies that require Coast Guard follow-up action will be documented in MSIS (or MSN).

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## **V. INSPECTIONS**

The following inspection activities shall be conducted by the Coast Guard and the Company TAIP Examiners, to fulfill the inspection requirements mandated by law and specified in the federal regulations.

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### **A. Introduction**

Traditionally, Coast Guard Marine Inspectors performed all annual inspections. However, under the TAIP program the Company TAIP Examiners will now conduct all annual “topside” inspections. Also, an annual inspection by a Company TAIP Examiner will be accepted in lieu of the “periodic” inspection required by 46 CFR 31.10-17(b)\*, since these annual inspections combined with the Coast Guard oversight discussed in Section VI of this Guide are considered equivalent to conducting the periodic inspection.

The Coast Guard will conduct all other required inspections, which are typically at 5 year or 10 year intervals. These include the Inspections for Certification, Drydock Exams, Internal Structural Exams, and Cargo Tank Internal Exams.

A chart summarizing the inspection intervals and general policy for traditional barge inspections vs. the TAIP program is provided on the following page.

This chart is followed by a description of the specific inspection responsibilities that shall be carried out by the Coast Guard and those that shall be carried out by the Company TAIP Examiners.

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\* The requirement for periodic inspections was put into effect by the Final Rule on “Frequency of Inspection,” published in Federal Register Vol. 65, No. 27, dated February 9, 2000.

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	<b>Traditional Program</b>	<b>TAIP</b>
<b>Inspection Intervals</b>	Per 46 CFR 31.10	<p><b>Company TAIP Examiners</b> will conduct annual topside inspections of 100% of the tank barge fleet, per 46 CFR 31.10-17.</p> <p>A <b>USCG Marine Inspector</b> will conduct all Inspections for Certification (5 yr interval), as well as the required DDE, ISE, and CTIE (either 5 or 10 yr interval).</p> <p>A USCG Marine Inspector will annually conduct the following TAIP Oversight:</p> <ul style="list-style-type: none"> <li>a) TAIP administrative review,</li> <li>b) TAIP oversight inspection of 20% of a company's tank barge fleet, and</li> <li>c) Audits of the OCMI designated Company TAIP Examiners.</li> </ul> <p>If the OCMI believes that a Company may not be in full compliance, he/she may direct a Marine Inspector to conduct oversight inspections of more than 20% of the fleet, or take remedial or automatic disenrollment action if appropriate.</p>
<b>Qualification of USCG Marine Inspectors</b>	USCG Marine Inspector - fully qualified for the type of tank barge involved.	USCG Marine Inspector - fully qualified for the type of tank barge involved.
<b><u>Type of Inspection:</u></b>		
<b>Inspection for Certification (46 CFR 31.10-15)</b>	<p>Conducted by a <b>USCG Marine Inspector</b>.</p> <p>This is a stem-to-stern inspection to ensure full compliance with the regs.</p>	<p>Conducted by a <b>USCG Marine Inspector</b>.</p> <p>This is a stem-to-stern inspection for compliance with regulations. Ideally, inspection will be conducted in concurrence with the DDE, ISE, and/or CTIE..</p>
<b>Annual "topside" Inspection (46 CFR 31.10-17)</b>	<p>Conducted by a <b>USCG Marine Inspector</b>.</p> <p>This is less stringent than an Inspection for Certification, but thorough enough to be confident that barge remains in compliance with regs.</p>	<p>Conducted by a <b>Company TAIP Examiner</b>, they will conduct annual topside inspection on 100% of tank barge fleet. OCMI confirms compliance by conducting TAIP Oversight.</p> <p>The company shall submit monthly reports to the TAIP Homeport OCMI to document which barges had received a satisfactory annual inspection during the previous month, so this info can be entered in the CG's vessel inspection database.</p>
<b>Drydock Exam (46 CFR 31.10-21)</b>	Conducted by a <b>USCG Marine Inspector</b> .	<p>Conducted by a <b>USCG Marine Inspector</b>.</p> <p>Note: This issue may be revisited in the future as the program matures.</p>
<b>Internal Structural Exam (ISE) &amp; Cargo Tank Internal Exam (CTIE) (46 CFR 31.10-21)</b>	Conducted by a <b>USCG Marine Inspector</b> .	Conducted by a <b>USCG Marine Inspector</b> .

<b>INSPECTIONS</b>	<b>TAIP Guide</b>	<b>Section: V</b>
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**B. Company Responsibilities**

Annual inspections will be conducted by the Company TAIP Examiners who are designated in writing by the TAIP Homeport OCMI. The Company TAIP Examiners are authorized to initial the Certificate of Inspection upon satisfactory completion of the annual inspection.

The Company shall notify their TAIP Homeport OCMI each time they complete an annual inspection on a TAIP barge, or submit a monthly report to document which barges were satisfactorily inspected over the previous month. The OCMI will then make appropriate entries into the Coast Guard's vessel inspection database (MSIS or MSN) to document these inspections.

The Company is not required to conduct an annual inspection the year when the COI expires (once every 5 years)\*, since the Coast Guard will conduct the Inspection for Certification. However, at least thirty (30) days prior to the expiration date of the COI the company shall submit an Application for Inspection to the cognizant OCMI. Ideally this shall be the TAIP Homeport OCMI, but if the barge is operating in a different inspection zone then the application shall be submitted to the local OCMI for that zone. The local OCMI may carry out the inspection. Upon receipt of the application, the OCMI will contact the Company to schedule an Inspection for Certification by a Coast Guard Marine Inspector.

**C. Coast Guard Responsibilities**

The Inspection for Certification, as well as the DDE, ISE, and CTIE, shall be conducted by a Coast Guard Marine Inspector. The COI inspection, which is on a 5 year inspection cycle, should whenever possible be conducted concurrent with the barge's DDE, ISE, and/or CTIE, which are typically on either a 5 or 10 year inspection cycle. The inspections shall be carried out as per 46 CFR 31.10-15 and 31.10-21.

These inspections shall be scheduled and documented in the Coast Guard's vessel inspection database (MSIS or MSN), the same as an inspection done under the traditional inspection program. Also, the Coast Guard shall make an appropriate entry in the vessel inspection database whenever notification is received that the Company has satisfactorily completed an annual inspection on one of its TAIP barges. See Section IV, Part E of this Guide for further guidance on database entries.

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\* The 5 year COI interval was put into effect by the Final Rule on "Frequency of Inspection," published in Federal Register Vol. 65, No. 27, dated February 9, 2000.

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## **VI. OVERSIGHT**

The following oversight activities shall be conducted by the Coast Guard, with the assistance of the Company TAIP Representative, to ensure the Company is complying with the provisions of the TAIP and maintaining all their barges in a safe condition in compliance with the regulations.

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### **A. Introduction**

Although the Coast Guard will not conduct the annual inspections on the barges, they will board a random sampling of 20% of the company's barge fleet each year to ensure the barges are being properly inspected and maintained in a continual state of regulatory compliance. They will also conduct an annual administrative review of the company's TAIP-related forms and paperwork, and will audit each Company TAIP Examiner to ensure they are properly carrying out their inspection duties. Additionally, the Coast Guard will perform oversight on the company's temporary repair practices, as discussed in Section VII, Part C of this guide.

TAIP Oversight is the systematic process in which a Coast Guard Marine Inspector reviews the Company's required TAIP documentation, conducts random on-board inspections of tank barges to assess the general condition of the fleet, and conducts performance evaluations of the Company TAIP Examiners. During oversight emphasis shall be placed on ensuring the Company is complying with their approved CAP and TAP(s). Specific emphasis shall be focussed on the training, inspection knowledge, and skills of the Company TAIP Examiners; and how well they are documenting the annual inspections including deficiency documentation and resolution. The Coast Guard will conduct random oversight of TAIP personnel performing inspections on representative systems and subsystems; and also conduct any relevant third-party verification to see that the equipment and systems being serviced by these outside contractors are in satisfactory condition. The full scope of TAIP Oversight is prescribed by the Coast Guard TAIP Oversight Form, an example of which is provided in Appendix C of this Guide.

The scope of the TAIP Oversight will be determined by the USCG Marine Inspector based upon his/her observations, and may be expanded to the level necessary to determine the level of company compliance with the regulations and with their approved CAP and TAP. Nothing precludes the Marine Inspector from expanding the scope of the inspection should there become doubt about the company's compliance with the regulations or their approved CAP and/or TAP.

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The success of the TAIP is dependent on an ongoing interactive process between the Coast Guard and a company's responsible TAIP personnel. The TAIP Oversight process ensures this interaction will take place.

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## **B. Coast Guard Responsibilities**

The Coast Guard will perform the following oversight activities, which shall be completed annually by the anniversary of the date the company was enrolled in TAIP:

- (a) Conduct an administrative review of the company's TAIP program – reviewing all of the company's TAIP-related files and paperwork,
- (b) Randomly select 20%<sup>1</sup> of the company's barge fleet and perform an oversight inspection on these barges to see that the company is maintaining them in a continual state of regulatory compliance, and
- (c) Conduct a performance review (audit) on each designated Company TAIP Examiner to see that they are properly carrying out their inspection duties, and to provide them with any updates on inspection policies, regulations, and laws.<sup>2</sup>

When conducting TAIP Oversight, Coast Guard Marine Inspectors shall focus on such things as:

- Whether the CAP and TAPs are adequate,
- How well the Company is adhering to their approved CAP and TAPs,
- Evaluation of review of personnel training and qualification records,
- Inspection knowledge and skills of the Company TAIP Examiners,

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<sup>1</sup> The 20% that are selected should be in addition to, and separate from, any barges that will be undergoing Coast Guard inspection for a COI, DDE, ISE, or CTIE that particular year. Also, the majority of the barges selected for oversight should not be ones that were boarded by the Coast Guard the previous year.

<sup>2</sup> These audits can be conducted simultaneously while performing the oversight inspections on 20% of the barge fleet.

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- Verification that the conditions aboard the tank barge are as documented (review the ECs and CRs),
- Deficiency documentation and resolution, including confirmation that noted corrective actions have been properly documented and performed,
- Random oversight of TAIP personnel conducting inspection procedures on representative systems/subsystems, to see that they are properly carrying out their inspection duties in accordance with the CAP and TAP, and
- Third-party verification, to ensure outside contractors are properly servicing specific equipment and systems.

Annual TAIP Oversight on twenty percent (20%) of a company's barge fleet shall be targeted. If the Marine Inspector believes that one or more of the tank barges are not in full compliance with the regulations at any given time, he or she may conduct a more thorough examination of the barge or barges, and may also opt to conduct oversight inspection on additional barges.

Often, a large portion of a company's barge fleet is operating in separate OCMI zones from that of their TAIP Homeport OCMI. The Homeport OCMI will retain primary responsibility to ensure proper TAIP oversight is completed for the company and its fleet. The Homeport OCMI's USCG TAIP Advisor will work with the Company TAIP Representative to ensure oversight inspections and Company TAIP Examiner audits are scheduled and completed as appropriate in other OCMI zones.

TAIP Oversight provides a necessary feedback loop for both the Coast Guard and the company. Oversight of the company's TAIP program involves evaluating four general categories of performance indicators:

1. **Breakdowns with TAIP Process,**
2. **Materiel Deficiencies,**
3. **Operational Changes,** and
4. **External Indicators** (marine casualty, civil penalty proceedings, changes to regulations, etc).

The TAIP Oversight will lead to one of three conclusions about the company's TAIP program, based upon these performance indicators:



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1. SATISFACTORY – NO ACTION NEEDED: The TAIP program is functioning properly and the desired level of safety is being maintained without Coast Guard intervention. The TAIP Homeport OCMI may consider reducing the amount of annual oversight from 20% to 15% of the barge fleet if the company's performance has been consistently satisfactory.
2. UNSATISFACTORY - REMEDIAL ACTION: Deficiencies in one or more of the performance indicators signal that remedial action is needed (see page 38 for "Causes for Remedial Action"). This may call for revisions in TAIP forms, training for the Company TAIP Examiners, or closer adherence to the defined TAIP program, any of which warrant increased Coast Guard and company interaction. In such cases, the TAIP Homeport OCMI may consider increasing the amount of annual oversight on the company's barge fleet from 20% to 25%.
3. UNSATISFACTORY – DISENROLLMENT: Deficiencies in the performance indicators are of such a serious, persistent, or widespread nature that the tank barge and/or the company should be disenrolled from the program (see page 39 for "Causes for Automatic Disenrollment").

The second and third conclusions will require immediate follow-up action. The determination of whether remedial action or automatic disenrollment is appropriate will be dictated by the severity of the deficiencies as per the four performance indicators. For worst cases, remedial action will lead to disenrollment.

If DISENROLLMENT is appropriate, the Coast Guard will amend the tank barge's COI to remove the TAIP endorsement. The company must then decide whether to seek reinstatement or operate that barge under the traditional inspection program. Authority to disenroll the company and its entire fleet of barges from the program rests with the District Commander, and shall be considered upon recommendation of the TAIP Homeport OCMI.

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1. Character of USCG  
TAIP Oversight  
Inspections

The character of the Coast Guard oversight inspections is different than that of traditional Coast Guard inspections. Under TAIP the Coast Guard marine inspector examines the TAIP administration and performance, rather than direct inspection of tank barge systems. The marine inspector's focus is on observing TAIP performance indicators; actual verification that the TAIP is

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being administered properly and that it is achieving its intended results.

2. A New Dynamic Takes Place in How Inspections are Managed

Based on the observations made, the marine inspector will make the official inspection conclusions and recommendations.

The dynamic that takes place during an TAIP inspection changes from one where the Coast Guard marine inspector directs the activities, to one where the Company TAIP Examiners demonstrate their performance of the company's TAIP program. Under TAIP, the company has agreed to conduct its tank barge operations in compliance with the approved CAP and TAP. Examples of non-compliance represent a possible breakdown in the TAIP and may suggest expansion of the Coast Guard marine inspector's inspection. Under TAIP, it is incumbent upon the company to verify compliance with the approved Plans.

3. Causes for Remedial Action

The breakdown in any of the four general categories of performance indicators will result in remedial actions appropriate for the severity of the breakdown. Such actions include, but are not limited to: (1) Further development or revision of the Company's Action Plan; (2) Further training of company personnel; (3) More frequent TAIP Oversight inspections by the Coast Guard; or (4) More frequent reports by company personnel. All remedial actions should result in increased verbal and written communications between the Company TAIP Representative, USCG TAIP Advisor, and OCMI. Remedial action may be considered by the TAIP Homeport OCMI for the following:

1. **Breakdowns with TAIP Process:**

- a. Failure to follow TAP or CAP (including, but not limited to, reporting procedures, training/safety programs, or drug and alcohol programs);
- b. TAIP Inspection deficiencies noted by the Coast Guard;
- c. Failure to update TAP in response to minor changes to tank barge arrangement or equipment.

2. **Operational Changes:**

- a. Any change in responsible TAIP personnel or company management;
- b. Change in tank barge service; or,

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- c. The lay-up of the tank barge.

3. **External Indicators:**

- a. A monetary assessment or letter of warning against the company under Coast Guard civil penalty procedures;
- b. A reportable marine casualty;
- c. A change in applicable regulations.

**NOTE:** Remedial actions for Material Deficiencies are not applicable. Such deficiencies are indicative of process breakdown and should be addressed accordingly.

4. Causes for Automatic Disenrollment

The breakdown in any of the four general categories of performance indicators could result in the automatic disenrollment of the tank barge, depending on the severity of the breakdown. The following items, arranged under their respective performance indicators, will result in the automatic disenrollment of the tank barge.

**CRITICAL NOTE:**

Failure to report either item #1 or #3 indicates a company's lack of good faith in carrying out the company's TAIP responsibilities.

- 1. **Breakdowns with TAIP Process:** Unreported materiel casualty that impaired the tank barge's seaworthiness, or resulted in damage to the tank barge or other property in excess of \$25,000.
- 2. **Materiel Deficiencies:** (if such deficiencies were obviously existent while the tank barge remained in operation in other than an emergency situation):
  - a. Missing required fire extinguishers;
  - b. Unauthorized modifications of structural arrangements;
  - c. Unauthorized modifications of equipment or structural arrangements which resulted in a prohibited discharge;
  - d. Failure to maintain required watertight boundaries;
  - e. Intentional override of any electrical or mechanical safety device or shutdown;

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- f. Significant noncompliance with federal requirements not otherwise described that give credible concerns on the part of the Coast Guard about the applicant's commitment to safety.

3. **Operational Changes:**

- a. Operation of the tank barge outside the scope of its COI; or
- b. Sale of the tank barge, that is, any selling of a tank barge from one company/organization to another, without notification to the Coast Guard.

- 4. **External Indicators:** Automatic disenrollment actions for External Indicators (civil penalty proceedings, reportable marine casualties, or changes to regulations) are not applicable. Such deficiencies are indicative of remedial actions and should be addressed accordingly.

**C. Company Responsibilities**

The Company TAIP Representative shall assist the Coast Guard in scheduling and conducting annual oversight activities.

Also, the Company TAIP Representative shall track all temporary repairs made to inland barges and summarize these repairs in an annual report that is submitted to the TAIP Homeport OCMI. More details about this report are provided in Section VII, Part D of this Guide.

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## VII. TEMPORARY REPAIRS

The following policy and procedures for temporary repairs apply to **inland tank barges ONLY**. For tank barges with an offshore route, the Coast Guard shall be contacted immediately if damage occurs and must approve all repairs, regardless of whether they are temporary or permanent in nature.

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### A. Introduction

One of the streamlining measures provided by the TAIP is a provision allowing barge companies to make temporary repairs for minor damage on INLAND TANK BARGES ONLY without having to obtain Coast Guard approval. This is particularly beneficial when damage occurs in the middle of the night or in a remote region. As long as the barge is enrolled in the TAIP then temporary repairs may be completed and the tow may proceed without having to wait for a Coast Guard Marine Inspector to arrive on scene and grant approval for the repairs. Ordinarily, Coast Guard approval is required before any repairs may be completed to an inspected vessel.

The company is required to notify the local OCMI within 24 hours of whenever any damage occurs, provide documentation on the damage and temporary repairs, and indicate the destination of the barge where the cargo will be discharged. This gives the OCMI the option of conducting an inspection once the barge arrives in port to discharge its cargo, and at that time the OCMI may require more extensive temporary repairs or permanent repairs to be completed.

The nature of inland barge operations often results in frequent yet relatively minor damage to the tank barges. The rubbing of barges against one another and against lock walls causes hull plating to be inset or wear thin in localized areas (especially side plating against frames and stiffeners; and barge corners, ends, and knuckles), while the majority of the hull plating remains in good condition. Low energy impacts of tank barges commonly occur against lock walls, other barges, and towboats and can result in hull deformation and weakened areas. Failure of coating systems, plate defects, and improper welds may also result in the need for unanticipated repairs.

Damage that requires repair often occurs when the tank barge is in an isolated area, well away from facilities with the equipment and technical expertise to conduct satisfactory permanent repairs. Also, proper gas-freeing of the tank barge usually cannot be readily conducted at the site where the damage occurs, so repairs

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involving welding, burning, and other spark producing actions cannot be completed without considerable time and expense.

Under many circumstances it is in the best interest of the public, the Coast Guard, and maritime industry to allow temporary repairs on a tank barge so it can proceed to a more appropriate location for permanent repairs to be completed. In some circumstances, immediate action to affect temporary repairs must be undertaken to prevent further risk to the barge and the environment.

The guidance on temporary repairs that is provided in this Section is intended to:

- a. Promote uniform and consistent policy for temporary repairs to be conducted by TAIP companies; and,
- b. Assist TAIP companies in determining the scope and nature of temporary repairs that are permitted.

This policy does not limit the cognizant Officer-in-Charge, Marine Inspection (OCMI), Captain of the Port (COTP); or other U.S. Coast Guard authorities from exercising the authorities granted to them in statute and regulation to exercise control over tank barges to assure the safety of life, property, and the marine environment. The extent of the repairs necessary to ensure a tank barge can operate safely is dependent upon a multitude of factors, including the precise nature of the damage, overall condition of the barge, what cargo it is carrying, and other risk factors.

Communication and trust between the Coast Guard and the companies enrolled in the TAIP are the key to success with temporary repairs. The Coast Guard will monitor each company's performance under the TAIP, and may modify what temporary repairs it will or will not allow based on how proactive and diligent the company has been with its repair practices. Also, for repairs that are beyond the usual scope of the TAIP, if the company has an exemplary track record with TAIP an OCMI may, on a case by case basis, evaluate their repair proposal and allow them to carry out the repairs without sending a Coast Guard Marine Inspector on-scene to oversee the repair work. In these cases the OCMI should carefully and thoroughly review the nature of the damage and proposed repairs, and consider the risk factors, before granting this type approval "over the phone."

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## **B. Policy & Procedures**

For inland barges enrolled in TAIP, the company will not need to obtain Coast Guard approval for temporary repairs if the damage is:

- (a) "Minor" damage; more specifically, damage that does not materially and adversely affect the vessel's seaworthiness or fitness for service or route, and is not otherwise reportable as a marine casualty per 46 CFR 4.05-1, and
- (b) Damage that does not involve cargo tanks.

Otherwise, the Coast Guard shall be contacted immediately and must approve any repairs. All temporary repairs made under the TAIP shall conform to the procedures and restrictions listed below. Each company should standardize their repair procedures, but a Company TAIP Examiner may provide specific approval for a temporary repair.

The company is required to notify the local OCMI within **24 hours** of whenever any damage occurs, provide documentation on the damage and temporary repairs, and indicate the destination of the barge where the cargo will be discharged.

Permanent repairs should be completed at the first convenient opportunity for the company. Within **45 days** of when the damage occurs, the company shall either complete permanent repairs or else obtain approval from the TAIP Homeport OCMI to defer permanent repairs for a mutually agreed upon timeframe (typically until the next time the barge is gas-freed or the next annual inspection). The company is required to monitor the temporary repairs, and if there is any evidence of failure they shall immediately notify the Coast Guard and effect permanent repairs.

The company shall comply with the following procedures and restrictions when carrying out temporary repairs:

1. Notification
2. Documentation
3. Prohibited Areas for Temporary Repairs
4. Barge to be made Water & Cargo Tight
5. Temporary Repairs At or Below the Waterline
6. Use of Repair Materials that are Incompatible with Water
7. Use of Repair Materials that Produce Heat
8. Use of Repair Materials Not Compatible with the Cargo
9. Cargo Prohibited if Not Compatible with Repair Materials
10. Temporary Repairs to Cargo Tanks

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#### 1. Notification

Proper notification shall be made to the U.S. Coast Guard (the local OCMI for the zone where the damage occurs) within **24 hours** of when the damage occurs. Notification shall accurately reflect the condition of the barge and all related circumstances, and shall include the following information:

- a. The name, Official Number, owner and operator, and contact point for the barge,
- b. The location of the barge,
- c. A description of the damage,
- d. The fact that the damage is minor in nature,
- e. The fact that this tank barge is enrolled in the Eighth Coast Guard District's Tank Barge Alternate Inspection Protocol (TAIP),
- f. The fact that temporary repairs will be (or have been) completed in accordance with the TAIP, and Eighth Coast Guard District policy (D8 Policy Ltr 15-2000) only calls for Coast Guard notification at this time,
- g. The destination of the barge (where the cargo will be discharged), along with its estimated time of arrival. If this is outside the inspection zone of the local OCMI, then the OCMI in the zone where the discharge will take place shall also be notified.

If the damage is severe enough that it materially and adversely affects the barge's seaworthiness or fitness for service, or is otherwise reportable under 46 CFR 4.05-1 as a marine casualty, then the Coast Guard must be notified prior to any work being conducted and must grant approval for the repairs. The local OCMI should consult with the TAIP Homeport OCMI as necessary when notified of such damage. In emergency circumstances the provisions of 46 CFR 35.35-75 allow the senior merchant marine officer present to pursue immediate actions necessary to rectify the conditions causing the emergency. Under limited circumstances, subject to review by the Coast Guard under 46 CFR 5, this provides authority for temporary repairs to be conducted prior to Coast Guard notification if the situation is so critical that immediate action must be taken in order to safeguard life, property, or the marine environment. Given the level of manning on towing vessels and convenience of cellular phones, the need to make temporary repairs prior to telephone notification



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of the Coast Guard, though permitted, should rarely occur. If temporary repairs are made prior to Coast Guard notification, then notification must be made as soon after the fact as possible.

## 2. Documentation

Written and/or photographic documentation shall be provided to the local OCMI by the owner or operator of the barge to fully detail the nature and scope of the damage and the temporary repairs that were completed. Photos are particularly useful, and digital photos are encouraged because they are easy to transmit electronically. This damage and temporary repair report shall include, but not be limited to, the following information:

- a. Extent and dimensional characteristics of the damage and repairs,
- b. Materials and methods used for the repairs,
- c. Location(s) on the vessel where such repairs were conducted,
- d. Name of the company personnel who supervised the repairs, and
- e. A statement signed by the Company TAIP Representative or a Company TAIP Examiner attesting that the repairs were satisfactorily completed and tested in accordance with the provisions of the TAIP.

This report shall be maintained for a period not less than ninety (90) days following completion of permanent repairs, and shall be provided upon request to the U.S. Coast Guard. The Company TAIP Representative will use these reports to compile the required Annual Report on temporary repairs, which is discussed in Part D of this Section.

Only intrinsically safe photographic equipment should be used when there is a risk of explosion due to the presence of flammable/ combustible vapors. When photographic equipment is not used, a detailed drawing or sketch of the temporary repair is recommended.

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3. Prohibited Areas for Temporary Repairs
 

Temporary repairs shall not be made to the following systems and equipment unless specific permission is received from the local OCMI:

  - a. Machinery Installations,
  - b. Electrical Systems,
  - c. Pressure Vessels,
  - d. Valves,
  - e. Alarms or overfill systems,
  - f. Cargo hoses,
  - g. Cargo pumps and related appurtenances,
  - h. Cargo gauging systems, and
  - i. Cargo monitoring equipment.

However, under emergency conditions temporary repairs may be completed without Coast Guard approval if such actions are deemed critical, pursuant to the provisions of 46 CFR 35.35-75, to protecting the safety of life, property, or the environment. If emergency repairs are made prior to notification of the U.S. Coast Guard, post repair notification must be made as soon as possible.

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4. Barge to be made Water & Cargo Tight
 

Upon completing of the temporary repairs the barge must be watertight/cargo-tight and must be reasonably expected to remain watertight/cargo-tight under all reasonable foreseeable weather and operating conditions for the duration of the temporary repairs.

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5. Temporary Repairs At or Below the Waterline
 

If temporary repairs are made to void spaces such as rakes, double bottoms, wing voids in locations within twelve inches or below the actual waterline, then sufficient de-watering equipment shall be available on-scene to allow for de-watering of the barge in the event of complete failure of the temporary repair. De-watering equipment shall be constructed of such materials and design that it can safely be used in the presence of the cargo, cargo residues and vapor that it may encounter if the nature of the temporary repair is such that its failure would result in the de-watering equipment being exposed to same.

For the purpose of this guidance, de-watering equipment is considered to be on scene if it is located aboard an attending tug (including dedicated fleeting area tugs) or located aboard a barge that is part of the same tow. If the barge is compartmentalized such that the failure of the temporary repair would not result in the barge's sinking or significantly adversely affect the barge's stability, structural integrity or handling, then no additional de-

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watering equipment beyond existing regulatory requirements is deemed necessary.

6. Use of Repair Materials that are Incompatible with Water

Repair materials subject to rapid deterioration in the presence of water shall not be used in any location where such repair material may reasonably be exposed to water.

7. Use of Repair Materials that Produce Heat

Repair material that create an exothermic (heat creating) reaction in the presence of any cargo, cargo residues or vapors, other repair material, or water or during curing shall not be used unless the exothermic reaction created is at least 100 degrees Fahrenheit lower than the lowest potential auto-ignition temperature for the cargo that the temporary material may be exposed to. Under the provisions of the Chemical Data Guide for Bulk Shipment by Water (CIM 16616.6A) auto-ignition temperature is defined as the minimum temperature required to ignite gas or vapor without a spark or flame being present. Auto-ignition Temperatures for cargoes are only approximate and may change substantially with changes in geometry, gas or vapor concentrations, presence of catalysts, and other factors. The use of repair materials creating exothermic reactions, though not expressly prohibited, is discouraged if other practical means are available to affect repairs.

8. Use of Repair Materials that are Not Compatible with the Cargo

Repair materials subject to rapid deterioration in the presence of cargo, cargo residues and/or cargo vapors shall not be used in any location where such repair materials may reasonable be exposed to such cargo, cargo residues and/or cargo vapors. For the purposes of making temporary repairs, repair materials not known through laboratory testing or documented field usage to exhibit satisfactory resiliency to deterioration from the specific cargo residues and/or cargo vapors shall be presumed to be unsatisfactory.

9. Cargo Prohibited if it is Not Compatible with Repair Materials

If temporary repairs are made with any material subject to rapid deterioration in the presence of any cargo, cargo residues and/or cargo vapors that the barge may carry or come into proximity with, then cargo that may deteriorate the temporary repair material shall not be loaded or handled by the barges until such time that repair material is replaced with a material not subject to rapid deterioration. For the purposes of making temporary repairs, repair materials not known through laboratory testing or documented field usage to exhibit satisfactory resiliency to

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deterioration from the specific cargo residues and/or cargo vapors shall be presumed to be unsatisfactory.

10. Temporary Repairs to Cargo Tanks

As a general rule, temporary repairs are not permitted to any cargo tank boundaries without specific approval from the cognizant OCMI.

However, if a company has a particularly good track record with its TAIP program and repair practices, the TAIP Homeport OCMI may authorize the company to make certain specific temporary repairs to cargo tanks without having to obtain Coast Guard approval. In this case the TAIP Homeport OCMI must make it clear in writing which temporary repairs are allowed without Coast Guard approval. Typically, this will only be permitted for relatively minor and low risk damage such as pin-hole leaks in the deck plating above a cargo tank.

If temporary repairs are made to a cargo tank, then the level of cargo shall be maintained so its surface is at least twelve (12) inches below the lowest portion of the repair until such time that permanent repairs are made to the satisfaction of the U.S. Coast Guard.

**C. Follow-up Action  
& Permanent Repairs**

It is the responsibility of the owner, operator, or other responsible party to conduct periodic monitoring of the temporary repairs, and if there is any evidence of failure they shall immediately notify the Coast Guard and effect permanent repairs. The local OCMI shall be immediately notified if:

- a. The temporary repair fails or evidence of potential failure is discovered (permanent repairs shall be completed prior to loading cargo, if the barge is empty; or at the end of the voyage, if the barge is loaded);
- b. The damage requiring the temporary repair spreads beyond its original boundaries. For example, if a crack that is temporarily repaired propagates beyond its original dimensions; or
- c. It becomes necessary for the agreed upon duration of the temporary repair be extended. Under most circumstances extensions of authorization for temporary repairs will not be extended if the need for such extensions is due to the failure of the owner, operator, or

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other responsible party to take reasonable action to ensure permanent repair.

The company is also required to track all temporary repairs made to its barge fleet, and provide a report to the Coast Guard each March to summarize all the temporary repairs. Details on this report are provided below.

Permanent repairs should be completed at the first convenient opportunity for the company. Within **45 days** of when the damage occurs, the company shall either complete permanent repairs or else obtain approval from the TAIP Homeport OCMI to defer permanent repairs for a mutually agreed upon timeframe (usually until the next time the barge is gas-freed or the next annual inspection).

#### **D. Annual Report**

Not later than March 15<sup>th</sup>, a written report shall be submitted to the TAIP advisor for the previous calendar year in order to facilitate ongoing evaluation of existing repair processes. The report shall include following information:

- a. Name, business address, and telephone number of the reporting company,
- b. Point of contact and position
- c. A summary for each barge for which temporary repairs were conducted . The summary should include: name of barge, official number, date of temporary repair, date of permanent repair, description of damage extent, location and temporary repair methodology.
- d. For each barge whose temporary repairs have failed or shown evidence of potential failure prior to the expiration of the temporary repair authorization, the summary should also include the cause of the failure and the means by which future failures can be prevented.

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## VIII. FREQUENTLY ASKED QUESTIONS (FAQs)

A number of questions, concerns, comments, and myths have arisen about the TAIP. The following information is provided in “FAQ” format to provide both the OCMI and industry personnel with clarification on common issues.

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**A. Other Inspection Programs & the TAIP**

FAQs in this section deal with various Coast Guard inspection programs and activities and how they are affected by the TAIP.

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**1. Can tank barges be enrolled in both ACP and TAIP?**

*No. The TAIP and the ACP are two separate and mutually exclusive inspection programs.*

- *The TAIP is an alternative method of conducting traditional Coast Guard inspections, with oversight inspections conducted by Coast Guard Marine Inspectors.*
  - *The TAIP is available as an alternative to any U.S. inspected tank barge.*
  - *TAIP requires compliance with the appropriate subchapter of Title 46 CFR.*
  - *The Alternate Compliance Program (ACP) provides for tank barge inspections to be conducted by a recognized classification society, such as ABS.*
  - *The ACP is available only to tank barges capable of operating on international voyages and classed through a recognized classification society.*
  - *ACP requires compliance with the tank barge's class rules, international standards, and the U.S. Supplement in lieu of the CFR.*
- 

**2. Is TAIP a Self-Inspection Program?**

*Not completely, although the vast majority of the examinations to verify compliance with the regulations will be done by a Company TAIP Examiner.*

- *Under TAIP, company personnel are responsible for conducting annual inspections of the barges and their various systems, recording their findings and initiating appropriate actions as specified in their OCMI-approved CAP and TAP.*
  - *The Coast Guard will still verify compliance with applicable regulations and the provisions of the company's approved action plans by conducting annual oversight.*
  - *The TAIP Homeport OCMI approves the Company and Tank Barge Action Plans, and designates properly trained and qualified company personnel as Company TAIP Examiners.*
-

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3. Will drydock exams be conducted by company personnel?

*No, at present all required drydock exams will be conducted by a qualified Coast Guard Marine Inspector.*

- *The Coast Guard will need to evaluate TAIP performance data before considering whether company personnel may be authorized to conduct credit drydock examinations.*

4. Will Critical Area Inspection Program (CAIP) inspections be addressed by the TAIP?

*No, CAIP inspections are not a regulatory program and will not be addressed by the TAIP. The TAIP provides an alternative inspection program that only addresses the specific regulatory requirements for the tank barge inspections.*

**NOTE:** *Currently, the Coast Guard is invited to attend CAIP surveys, but we are not required to witness the inspection. The CAIP surveys can be included as part of a CAP or TAP just like any other preventative maintenance program, if approved by the OCMI as part of the plan.*



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## **B. TAIP Specifics**

FAQs in this section deal specifically with TAIP program policy, including the handling of prototype-TAIP programs and the handling of other “quality” management standards/programs.

### **1. What will USCG Marine Inspectors look for during TAIP Oversight?**

*Marine Inspectors performing TAIP Oversight will conduct their examinations to confirm vessel compliance with the regulations and Company TAIP Examiner compliance with the provisions of the CAP and TAPs. A copy of the Coast Guard's recommended TAIP Oversight Inspection Form, including instructions on its use, is provided in Appendix C of this Guide.*

- *The Marine Inspector will only expand the examination parameters if discrepancies are discovered or there is otherwise cause for concern.*
  - *These would be instances where the Marine Inspector believes the tank barge is not being operated in complete compliance with the regulations and the approved TAP.*
- *The OCMI remains responsible for verifying the safe operation of tank barges, therefore the degree of severity of the discrepancy would dictate the actions taken by the OCMI.*
  - *There is nothing in the TAIP that diminishes the OCMI's authority or responsibility to ensure the safety of life, property, the environment, and facilitation of maritime commerce within that zone.*

### **2. Is 20% annual oversight of the barge fleet mandatory?**

*No. At the time of enrollment into the TAIP and under normal circumstances 20% of a company's tank barge fleet will be subject to annual oversight inspections by the Coast Guard, as discussed in Section VI of this Guide. However, the TAIP Homeport OCMI may consider rewarding top-performing companies - those that clearly maintain their barges in a continual state of regulatory compliance - by reducing the amount of annual oversight to 15%. On the other hand, for a marginally compliant TAIP company, the OCMI may consider taking probationary action by increasing the annual oversight to 25%.*

### **3. Will user fees be reduced to encourage enrollment in the TAIP?**

*The Coast Guard may consider a regulatory project to review and possibly reduce user fees for enrolled tank barges when sufficient data is available. Prototype programs have required varying degrees of Coast Guard involvement, and therefore it has been difficult to evaluate the costs or savings associated with the TAIP.*

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**4. Once a tank barge is disenrolled from TIAP, what are the procedures for re-enrollment or reinstatement?**

The following table clarifies the procedures for reinstatement or re-enrollment of a tank barge that has been disenrolled from the TAIP program.

Re-entry Mode	Applies When	Process
<b>Reinstatement</b>	<ul style="list-style-type: none"> <li>Tank barge has been disenrolled from TAIP, voluntarily or involuntarily.</li> <li>Ownership never changed during the interim.</li> <li>Company seeks to have tank barge's TAIP status reinstated.</li> </ul>	<ul style="list-style-type: none"> <li>Apply to OCMI for Reinstatement.</li> <li>OCMI conducts historic review of company and tank barge to ensure no major changes have occurred in either which may indicate unsuitability for enrollment.</li> <li>Involuntarily disenrolled companies may request special consideration in light of improvement.</li> <li>If satisfactory, reinstatement will be granted.</li> </ul>
<b>Re-Enrollment</b>	<ul style="list-style-type: none"> <li>Tank barge changes ownership.</li> <li>Tank barge was in TAIP at time of sale.</li> <li>Both prior and new owners are TAIP companies.</li> <li>New owner seeks to continue tank barge in TAIP.</li> </ul>	<ul style="list-style-type: none"> <li>Same as for Reinstatement.</li> </ul>

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**5. How will a merger between a TAIP and non-TAIP company affect continued participation in TAIP?**

*It is dependent upon which company is absorbed, and which remains.*

- *In general, and contingent upon OCMI review, if the dominant management system remaining after the merger is that of the TAIP enrollee, the previous TAIP will in most cases continue after the necessary revisions are made to the existing CAP and TAPs.*
- *On the other hand, if the dominant management system is that of the non-TAIP company, the new entity will be required to fully comply with the enrollment procedures. This process should be simplified by the existence of previously accepted CAP and TAPs for the TAIP.*

**6. Does a tank barge's age impact its eligibility for TAIP?**

*The Coast Guard's experience has been that the age of a tank barge is not the most reliable indicator of its condition or suitability for continued safe operation.*

- *Age alone is not, therefore, a singularly disqualifying factor for TAIP eligibility.*
- *In considering a tank barge for enrollment, the OCMI will review all aspects of a tank barge's condition, its history, and the operational and management practices relative to the tank barge's service.*

**7. Can Company TAIP Examiners carry out inspections during new construction?**

*No. The inspections conducted during new construction are of a much different scope and nature than those conducted for an annual inspection. A Coast Guard Marine Inspector will conduct all necessary inspections during new construction, just as they would for any other inspected tank barge.*

**8. Must annual inspections be documented in MSIS?**

*Yes. An administrative MSIS case will be generated each time the OCMI receives documentation (a monthly report or the individual Exam Checklist) that a Company TAIP Examiner has completed an annual inspection on a TAIP barge and the barge is in a satisfactory condition. This case will be used to document the inspection and update the inspection status of the barge. For more details on database entries, see Section IV, Part E.*

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## C. Waivers

FAQs in this section deal specifically with TAIP policy on granting waivers, including waivers for new construction tank barges and tank barges of unique design.

### 1. Can the 3-year operational history requirement be waived to enroll tank barges that are newly constructed or recently acquired?

- For newly constructed tank barges – Yes. These barges are probably in the best condition they will ever be in, and this is the best time for tank barges to be enrolled in the TAIP.
- For recently acquired existing tank barges – Maybe. If a company enrolled in the TAIP ensures that its new barges are fully compliant with the regulations, then a tank barge's performance under a previous operator during the past 3 years should not be indicative of that tank barge's eligibility for TAIP. Unless the OCMI has reason to question the seaworthiness or suitability of service for the tank barge, then the 3 year operational history review may be waived.

Generally, the TAIP enrollment period required for these barges will be that necessary to develop and approve a TAP and verify its suitability by completing the operational evaluation portion of the enrollment process. If the company already has a TAP that can be used for the barge, this process can be greatly expedited.

### 2. Are newly formed companies eligible for TAIP, or must they establish a 3-year operational history before applying?

If, in the OCMI's opinion, a newly formed company is sufficiently competent to manage their tank barge(s) under the TAIP, the 3-year operational history requirement may be waived. The determination as to whether or not to grant enrollment in the TAIP will be made during the course of the company's development of the CAP and TAPs, and its operational evaluation. The minimum time period that should be expected to complete this evaluation and enrollment process is approximately one year.

The 3-year operational history requirement, though not mandatory, is very beneficial because it provides the OCMI with an indication of a company's commitment to the safe operation of its barge fleet.

### 3. Are tank barges of "unique design" eligible for TAIP?

Maybe. That determination is to be made by the OCMI in consultation with D8(m) and the Marine Safety Center.

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**4. May components of TAIP be waived for companies that have implemented recognized quality management programs?**

*Components of the TAIP would not necessarily be “waived,” but the company is allowed to reference their quality management program in lieu of providing specific components required by the TAIP (specific components required in the CAP and/or TAPs). The Coast Guard doesn’t intend to impose a redundant burden on companies that have already implemented a quality management program, provided the training requirements of the quality management program meet those of the TAIP. Some quality management programs that are recognized by the Coast Guard are the International Safety Management (ISM) Code, the Responsible Carrier Program (RCP) developed by the American Waterways Operators (AWO), and ISO 9000.*

**5. What is the procedure for waiver requests?**

*A company may request a waiver at anytime. The Company TAIP Representative shall submit the request for any waivers relating to the TAIP program to the TAIP Homeport OCMI. If the waiver is regarding a regulatory requirement instead of a provision or procedure of the TAIP program, then the waiver shall be submitted in accordance with the procedures put forth by the applicable federal regulations (see 33 CFR 19.01 and 46 CFR 6.01).*

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**D. Action Plans  
(CAP & TAP)**

FAQs in this section deal with issues centering on the development of action plans (CAP and TAP) required for participation in the TAIP.

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**1. Does there have to be a separate TAP for each barge?**

*No. One TAP may be acceptable for a “class” of similar barges, as long as the construction, configuration, piping and equipment are consistent and one set of inspection procedures can be used for all of the barges.*

- *Inspection certificates and company documents are routinely maintained on board unmanned tank barges.*
  - *Only Coast Guard inspection documents are required to be on board.*
- 

**2. Must the TAPs be maintained on board the barges?**

*No. They don't have to be maintain on board the barges; however, the TAP must be made available to the Coast Guard upon request.*

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**3. May documents and plans created for quality management programs be used in the CAP?**

*Yes. The use of ISM documentation or other documents, such as those developed for the RCP or ISO 9000, may be incorporated into a CAP or TAP. Ultimately, the CAP and TAP must contain all the required material in order to be approved by the OCMI.*

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**4. May computer-based or other types of PMS be used in the TAIP?**

*Yes. Companies that have in place a computer-based, or otherwise established PMS, may incorporate that system into their TAIP. Suitable cross-referencing must be provided so that any USCG Marine Inspector will be able to conduct the requisite periodic inspections without difficulty.*

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**5. When is a company required to submit action plan revisions to the OCMI for approval?**

*The Coast Guard must be kept informed of changes that affect a company's CAP or TAP. The Company TAIP Representative and USCG TAIP Advisor should agree on a frequency for review, revision, and submission of revisions for approval.*

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**6. Must the CAP include each of the TAPs as appendices?**

*No. The CAP and TAPs are interdependent documents. It is necessary that each TAP be maintained on file (and updated if necessary) by the Company TAIP Representative, plus there will need to be a copy readily accessible for use by the Company TAIP Examiner when conducting the annual inspection of the tank barge. How this is satisfied is left to the USCG TAIP Advisor and Company TAIP Representative to work out.*

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**7. Can companies use the nomenclature from a prototype SIP program or quality management program in the TAIP?**

*Yes. This is permitted as long as the approved plans are in compliance with the TAIP guidance. A cross-reference sheet or glossary to define the nomenclature in the prototype program or other existing quality management program in terms of the TAIP's nomenclature will be necessary.*

- If a prototype SIP program is already in place and is in compliance with the TAIP guidance except for its nomenclature, a cross-reference glossary or index may be developed to , as long as it allows confirmation of a plan's compliance with the requirements of the TAIP program.*
  - Components of other quality management schemes, or other company defined nomenclature, may be incorporated into the TAIP Plans, provided adequate cross-referencing is made.*
  - The OCMI has the flexibility and authority to accept revisions to prototype plans.*
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**E. Outside (Third Party) Contractors**

FAQs in this section deal with the use of outside (third party) contractors in a company's TAIP Program.

**1. Will outside contractors or vendors be allowed to serve as Company TAIP Examiners?**

*No. The TAIP requires company personnel to conduct examinations.*

- *Company personnel's participation will provide a sense of ownership and improve safety awareness.*
- *Company's may use a third party surveyor for consultation and support, but the liaison between the Coast Guard and tank barge must be through a bona fide company employee with the authority to make binding agreements on the company's behalf.*
- *A Third-Party Surveyor MAY NOT be used to conduct and record the annual inspections, they MUST BE CONDUCTED BY COMPANY PERSONNEL.*
- *Outside consultants may be utilized in program development and personnel training, but company personnel must conduct the annual inspections on the tank barges.*

**2. Can third-party personnel be used to inspect and certify specific systems & equipment, and correct deficiencies?**

*Yes. It is recognized that the maintenance, examination, or servicing of certain tank barge systems and equipment may be beyond the abilities of a company's tank barge or shoreside support personnel. In these cases, outside (third-party) expertise may be appropriate. Third-party personnel can include marine surveyors, class society surveyors, consultants, contractors, vendors, etc.*

- *Outside personnel utilized in this manner must be described in the TAP.*
- *The CAP should identify the responsibilities of those individuals who examine and maintain specific systems and equipment, and provide guidance on how to verify and record their satisfactory performance. This applies to outside personnel, as well.*
- *The Company TAIP Examiner remains responsible for verifying that the work is completed by approved facilities and qualified personnel when appropriate, that the equipment is installed and functioning properly, and the work has been properly documented.*



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**F. Barges operating in Multiple OCMI Zones**

FAQs in this section deal with how barges that operate in multiple OCMI zones will be managed (both for inspections and oversight) under the TAIP program.

**1. Which OCMI has the overall responsibility for TAIP vessels operating in more than one OCMI zone?**

*For companies with tank barges operating in more than one OCMI inspection zone, the CAP and TAP will be approved by the cognizant OCMI in the zone where the initial application for the TAIP enrollment is made (the “TAIP Homeport OCMI”). This should be the OCMI that issues the COI for the barges.*

*The Homeport OCMI will retain primary responsibility to ensure proper TAIP oversight is completed for the company and its fleet. The USCG TAIP Advisor for the homeport OCMI will work with the Company TAIP Representative and with other OCMI to ensure oversight inspections and Company TAIP Examiner audits are scheduled and completed as appropriate in other OCMI zones. It is essential that the USCG TAIP Advisor communicate and coordinate inspections with the appropriate OCMI, to see that proper TAIP program oversight is maintained for all enrolled tank barges regardless of where they are operating.*

**2. What MSIS (or MSN) database entries should be made?**

*Any unit conducting a COI, DDE, ISE, or CTIE shall make all the appropriate database entries that they would ordinarily make for a tank barge being inspected in the traditional manner. The new COI should be issued by and have the signature of the local OCMI, but shall retain the standard TAIP endorsement to identify the TAIP Homeport OCMI (see Section III, Part I). The local OCMI shall notify the TAIP Homeport OCMI if they will be making any modifications to the wording of the COI due to local policy, and give the TAIP Homeport OCMI the option of issuing the COI themselves to maintain a “standardized” COI for each their TAIP barges.*

*Any unit conducting an oversight inspection will make an MIAR entry to document this inspection. It is essential that an entry be made in the Coast Guard’s MSIS (or MSN) database in a timely manner to document the inspection, especially for barges from another OCMI zone, so that unnecessary oversight inspections are not scheduled by another OCMI. Good communications need to be maintained between the OCMI conducting the oversight and the TAIP Homeport OCMI, so the USCG TAIP Advisor for the TAIP Homeport OCMI can track and coordinate the appropriate oversight inspections for the barge fleet.*

*For more details on database entries, see Section IV, Part E.*

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**3. How should inspection issues and serious deficiencies be handled?**

*Barges found to be in an unsatisfactory condition, or not in compliance with their TAP, shall be reported to the TAIP Homeport OCMI who will determine the appropriate action to take. Authority to remove a barge from the TAIP program rests with the TAIP Homeport OCMI. Authority for removing a company and its entire fleet of barges from the program rests with the District Commander, and shall be considered upon recommendation of the TAIP Homeport OCMI.*

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**4. What role does the Company TAIP Representative play?**

*It is the responsibility of the Company TAIP Representative to maintain a detailed listing of the company's barges that enrolled in the TAIP program. This listing shall track when and where USCG oversight inspections were conducted, and when and where the Company TAIP Examiner(s) conducted the annual inspection on each barge. This listing should include which Company TAIP Examiner conducted the annual topside inspection on each barge. The Company TAIP Representative shall make this information available to the USCG TAIP Advisor to facilitate the scheduling and management of the annual TAIP oversight inspections and Company TAIP Examiner audits.*

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## IX. TAIP Forms

### Appendix:

- A. Examination Checklist (EC)
- B. Correction Report (CR)
- C. Coast Guard TAIP Oversight Form
- D. Inspection Criteria References (ICR) for Tank Barges